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MEMO ENDORSED

December 17, 2019

The Honorable Barbara Moses Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 740 New York, NY 10007-1312

Barbara Moses, U.S.M.J.

Re: DoubleLine Capital, LP v. Odebrecht Finance, Ltd., No. 17-cv-4576-GHW-BCM

Dear Judge Moses:

We have recently been retained to represent Odebrecht Finance Ltd., Construtora Norberto Odebrecht S.A., and Odebrecht S.A. (collectively, the "<u>Defendants</u>") in the above-captioned action. Pursuant to paragraph 2.A of this Court's Individual Rules of Practice ("<u>Individual Practices</u>"), we write to respectfully request that the Court extend the December 31, 2019 deadline for Defendants' response to Plaintiffs' third amended complaint ("<u>TAC</u>") for two weeks until January 14, 2020, for the reasons set forth below. This is the Defendants' first request for an adjournment of their deadline to file an answer, and plaintiffs in the above-captioned action consent to the request.

The Defendants' primary basis for their request is to permit the Defendants an adequate opportunity to submit a draft of their answer to the TAC to the U.S. Department of Justice to review the draft in connection with the facts described in the Information and Statement of Facts filed in *United States v. Odebrecht S.A. 16-cr-643* (E.D.N.Y.). Defendants also submit that the request for a two-week extension is appropriate given that this Firm has only been retained in the past week and in light of the upcoming holidays. The Defendants' request would not affect any other deadline set by the Court.

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	Respectfully submitted,	
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	/s/ Victor L. Hou	
	Victor L. Hou (vhou@cgsh.com) Luke A. Barefoot	
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Cc: All counsel of record (via ECF)		
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